

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )  
 )  
 v. ) Criminal No. 04-36 Erie  
 )  
 MAURICE FRANCIS FOLEY )

**GOVERNMENT'S MOTION TO DISMISS COUNTS**  
**SUBSEQUENT TO SENTENCING**

AND NOW comes the United States of America, by and through its attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Christian A. Trabold, Assistant United States Attorney for said district, and states as follows:

1. On July 28, 2005, Maurice Foley was sentenced to 330 months incarceration on his conviction at counts one and three of the Indictment.

2. Pursuant to the written plea agreement, the government seeks dismissal of the remaining counts of the Indictment which name Maurice Foley, namely counts two, four and six through sixteen.

WHEREFORE, the government respectfully requests that this Court issue an order dismissing counts two, four and six through sixteen.

Respectfully submitted,

MARY BETH BUCHANAN  
United States Attorney

s/Christian A. Trabold  
CHRISTIAN A. TRABOLD  
Assistant U.S. Attorney  
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